



echoed the Joint Board's decision that all "commercially available"<sup>2</sup> services should be eligible for discounts. The rule does not specify that those services must be under contract. Many libraries purchase telecommunications and other services on a month to month (or quarter to quarter) basis, without signing any long term contracts for the services' provision. These entities should not be penalized for making wise fiscal choices.

## **Data Collection**

### **The Proposed System Places an Excessive Burden on the Applicant**

The proposed data collection alluded to by questions 7 and 8 on form 471 and fleshed out during the meeting on October 10 is simply unworkable, especially on a timeline which is now measured in weeks. The proposed system -- which would collect individual library and school data from not only individual applicants but also "aggregated applicants," such as library systems, and consortia -- would require libraries to collect large amounts of data which many of them currently do not collect.

The problem is most severe for library systems and school districts where services are purchased out of central budgets, rather than independent budgets of individual library branches and schools. These library systems already have in place mechanisms for allocating *services* and for paying for those services out of the central budget. The proposed application form would place an excessive burden on applicants by forcing library systems to go through the process of changing their local budgeting and billing processes, or establishing an entirely new second set of procedures, in order to comply with the information being requested in the draft forms.<sup>3</sup> The proposed application form and process could in many cases overturn budgeting decisions made to benefit the community the library is attempting to serve.

While the burden of filling these forms out may be easily handled by the "haves" in the information age -- who may have already developed computer database systems that make such allocation information more readily available -- the information "have-nots" will be those who are most burdened by these requirements. It is typically the have-nots that will be attempting to form and join consortia in order to minimize the costs of services. Unfortunately, whether these have-nots are large, underfunded urban system or large, spread-out rural systems, their aggregating with other entities will only unnecessarily increase their burden in attempting to fill out the forms. In other words, the entities with the least capability will be those that are worst hit by the proposed system (since they will be attempting to aggregate in order to best make use of their

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<sup>2</sup>See the Report and Order on Universal Service, FCC 97-157, May 8, 1997, Paragraphs 431 and 434.

<sup>3</sup>In some cases, the data requested -- such as the cost attributable to individual facilities -- is not available when services are purchased centrally.

very scarce resources). This can hardly be what the Commission intended when designing these forms.

### **The Information Requested is Redundant**

The FCC may well wish to collect information on individual school lunch rates for the multitude of libraries that will be participating in the program. However, such information is already available from the National Center for Education Statistics at the US Department of Education. In fact, libraries have been referred to NCES for collecting that data about their local school district in order to determine their discounts percentages. Hence, collecting data about the number of patrons or students served is a redundant request.<sup>4</sup> Furthermore, discount percentages can be derived automatically by the fund administrator by applying school lunch data to the table provided by the FCC in the May 8, 1997 ruling on Universal Service. NECA indicated during the October 10 meeting that NECA has already input all of this information into its database, which would make collecting it from library systems and individual libraries a redundant effort in data collection.

### **The Proposed System Preempts Local Governance Decisions on Budgeting and Resource Allocation**

The data requests of the FCC can only be justified if the Commission is planning on dictating a disaggregated discount structure to all libraries in the country. It is questionable whether the FCC has such authority. However, the FCC also made it very clear that it foresaw library systems applying as averaged applicants; "The library system may decide to compute the discounts on an individual branch library basis or it may decide to compute an average discount; in either case, the library system shall strive to ensure that each library receives the full benefit of the discount to which it is entitled."<sup>5</sup> Furthermore, it is questionable whether dictating such a structure would be desirable and would further the goals of the program.

Within library systems, fiscal authority resides at the level of the system. Individual libraries within a system do *not* have any fiscal independence. Hence, it is incorrect to assume that telecommunications services are paid out of a library's budget; in almost all cases, these services are purchased centrally and distributed according to the decisions made by local officials. These

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<sup>4</sup>As clarified at the meeting, the FCC is actually looking for data on the population service area, rather than the number of patrons. This information is collected by NCES; see Tables 2A, 4A, 5A, 6A, 7A, 8A, 9A, 10A, 11A, etc. in Public Libraries in the United States: 1994, National Center for Education Statistics, US Department of Education, 1997. As clarified in the meeting, data is *not* collected that deals with the number of patrons.

<sup>5</sup>Report and Order on Universal Service, FCC 97-157, May 8, 1997, Paragraph 524.

officials are accountable to the public for the distribution decisions they make, and make those decisions based on local needs. The FCC should not attempt to second guess these decisions with a "one-size-fits-all" approach to determining what the appropriate procurement and accounting policies should be for all libraries. In some cases, these local practices serve to bolster the goals of the universal service program by allocating costs in such a way as to promote access in high cost and low income areas. It should be noted that the cost allocation principles used by these school districts and library consortia are auditable against the generally accepted accounting principles (GAAP), which helps to prevent abusive cost allocations. Finally, it appears to us that the proposed data collection presupposes that individual library branches wield their own fiscal authority -- an erroneous conclusion.

It is also unclear that imposing such a system would have the beneficial effects desired by the Commission. In many cases, existing allocation systems within consortia and library systems are triggered to meet the fiscal realities faced locally. For instance, many consortia do not directly allocate line costs to individual libraries that are members of the consortia; instead, they use proxies to determine what the appropriate share would be. In the Libraries Online, Inc. network in Connecticut, for instance, costs are divided among member libraries based on the number of terminals in the library. This has the net effect of making services less expensive for those libraries located furthest from the switch -- in almost all cases, the libraries furthest from the switch are the rural or urban high poverty libraries. Requiring a system such as that envisioned by the FCC would undercut this established local policy.

### **Potential Impacts of the Requirement**

By prescribing a cost allocation formula for consortia and library systems, rather than implementing a system flexible enough to take into account current methods of allocation, the Commission is inviting a number of potential problems. Some of these problems were raised within the context of the October 10 meeting, while others were not.

The system outlined during the October 10 meeting would discourage the filing of aggregated applications and, by implication, aggregation in general. Large applicants, such as consortia and large library systems, would face a substantially larger burden than smaller applicants. By making the burden more difficult for larger entities, the proposed system would encourage individual libraries to apply on their own. While such an outcome would ensure that every individual library did get the "appropriate" discount, it would also have a number of unintended side effects. The benefits of aggregation -- namely, lower pricing, the ability to share critical human and physical infrastructure, and the benefits of working together with partners -- would effectively be denied to these applicants.

Smaller libraries, and libraries with smaller staffs, are going to be especially burdened by having to fill out long and onerous application forms. These staffs are already fulfilling a broad array of functions at their libraries -- functions assigned to specialized staff at larger library systems -- and we seek to minimize the additional (and unnecessary) burden placed on these librarians. Because

these libraries often make the fiscally responsible decision to join library consortia (in order to minimize their costs and to enhance their services), the potential burden is significantly higher for these entities. Because of their limited resources, they are often unable to deal with the large amounts of paperwork which accompany most grant programs. Forcing them to enter hundreds of lines of data in order to be eligible for the universal service program will serve as a strong disincentive for their applications. At the same time, these are the entities directly targeted for the deepest discounts -- the entities that the program is supposed to reach.

### **Conclusion**

Overall, the Commission has made great progress in the application forms, and continues to make progress. However, there are several issues which must be dealt with as soon as possible in order to make this program successful.

We are greatly concerned with the reinterpretation of the definition of eligible services that manifested itself at the October 10, 1997 public meeting to discuss the proposed forms. It comes as a complete surprise that the Commission staff is interpreting "commercially available" to mean "commercially available under contract." Many libraries purchase services on a tariffed, month to month basis, and these services should be eligible for discounts.

ALA also believes that the effect of the current proposal would be to discourage application to the universal service program. In particular, questions 7 and 8 on form 471 will, if they go forward in their current interpretations, create an overwhelming burden of paperwork which will discourage applications from rural libraries and schools -- the very entities targeted by Senators Snowe, Rockefeller, Exon, and Kerrey when they extended the universal service program to libraries and schools. It will also discourage the creation and maintenance of consortia, and impinge on local governance decisions. As numerous libraries and schools have informally commented to the FCC, the regime proposed in the publicly released October 9, 1997 drafts of forms 470 and 471 is unworkable and represents a bureaucratic morass for even the smallest applicants.<sup>6</sup> We strongly urge the Commission to address these problems as soon as possible.

Sincerely,



Carol Henderson  
Executive Director  
Washington Office  
American Library Association

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<sup>6</sup>Some of these comments are attached as Appendix B.

CC: Mark Nadel, FCC Universal Service Branch  
William Caton, Acting Secretary, FCC

## Appendix A: The Proposed Forms

These forms were downloaded in PDF format from the FCC Web Site at <http://www.fcc.gov>.

# Schools and Libraries Universal Service Program

## Description of Services Requested and Certification

Estimated Average Burden Hours Per Response: 3 hours

**Please read instructions before completing.** (To be completed by entity who will negotiate with providers.)

1. Name of Applicant:																
2a. Federal Employer Identification Number (EIN): (Individual schools or libraries should supply this information if they have an EIN.)			2b. School Code: (Insert school code) (SLC will insert this code.)													
2c. Applicant ID Number (assigned by SLC)			2d. Control Number (assigned by SLC)													
3. Type of Applicant (Check only one in the first column on the left, but if a consortium, also check all others that apply from other columns):																
<table border="0"><tr><td><input type="checkbox"/> school</td><td rowspan="4">If consortium of schools, libraries, or other entities, all that apply</td><td><input type="checkbox"/> state education agency</td></tr><tr><td><input type="checkbox"/> school district</td><td><input type="checkbox"/> includes non-governmental entities ineligible for funding</td><td><input type="checkbox"/> local education agency</td></tr><tr><td><input type="checkbox"/> library or library consortium under the LSTA</td><td><input type="checkbox"/> entity desires separate billing for each member of consortium</td><td><input type="checkbox"/> education service agency</td></tr><tr><td><input type="checkbox"/> consortia of multiple eligible entities</td><td><input type="checkbox"/> regional <input type="checkbox"/> statewide <input type="checkbox"/> state</td><td></td></tr></table>					<input type="checkbox"/> school	If consortium of schools, libraries, or other entities, all that apply	<input type="checkbox"/> state education agency	<input type="checkbox"/> school district	<input type="checkbox"/> includes non-governmental entities ineligible for funding	<input type="checkbox"/> local education agency	<input type="checkbox"/> library or library consortium under the LSTA	<input type="checkbox"/> entity desires separate billing for each member of consortium	<input type="checkbox"/> education service agency	<input type="checkbox"/> consortia of multiple eligible entities	<input type="checkbox"/> regional <input type="checkbox"/> statewide <input type="checkbox"/> state	
<input type="checkbox"/> school	If consortium of schools, libraries, or other entities, all that apply	<input type="checkbox"/> state education agency														
<input type="checkbox"/> school district		<input type="checkbox"/> includes non-governmental entities ineligible for funding	<input type="checkbox"/> local education agency													
<input type="checkbox"/> library or library consortium under the LSTA		<input type="checkbox"/> entity desires separate billing for each member of consortium	<input type="checkbox"/> education service agency													
<input type="checkbox"/> consortia of multiple eligible entities		<input type="checkbox"/> regional <input type="checkbox"/> statewide <input type="checkbox"/> state														
4. Street Address																
City	State	Zip Code	Telephone number	E-mail Address												
5. Contact Person's Name:																
Street Address (if different from Item 4)																
City	State	Zip Code														
Check preferred mode of contact: <input type="checkbox"/> Telephone <input type="checkbox"/> FAX <input type="checkbox"/> E-mail <input type="checkbox"/> Other:																
6. Number of students:																
7. Number of buildings to be served:		8. Number of rooms to be served:														
9. For individual schools (not including districts) filing independently, number of students eligible for National School Lunch Program. For individual libraries, school code of the district in which they are located.																



10 ☐ Check only if institution seeks discounts for eligible services that are the subject of an **existing** contract and proceed to Block 4.

11a ☐ Check here if you have a Request for Proposal (RFP) available and if the RFP is posted on a website, provide the website address \_\_\_\_\_. You must also summarize the RFP in questions 12-14. You should also include a summary text in 12b. below.

11b. If you do not have an RFP, you must describe the services you are requesting. You must provide technical requirements or give an informal description of your telecommunications goals. You must also complete questions 12-14.

	Existing Service	Desired Service	Details (Optional)
<b>12. Telecommunications Services</b>			
a. Number of phones that have or require service			
b. Number of computers that have or require service			
c. Number of high bandwidth video conferencing links			
d. Video retrieval service providers			
e. Connections between buildings			
f. Other			
<b>13. Internal Connections</b>			
a. Number of buildings with all rooms connected			
b. Number of buildings with all rooms connected			
c. Other			
<b>14. Internet Access</b>			
a. Dial up			
b. Highest speed of dial up connections			
c. Direct connections			
d. Highest speed of direct connections			
e. Other			

15. ☐ Check here if there are any restrictions imposed by state or local laws on how and when providers may contact you or on other bidding procedures. Please describe below any such restrictions or procedures.

16. Ineligible services and facilities necessary for schools and libraries covered by this application to use eligible services requested effectively: *(Check the relevant boxes. You may provide details for purchase or being sought.)*

- a. Communications software: Software required ☐ has been purchased or ☐ is being sought.
- b. Electrical systems: ☐ adequate electrical capacity is in place or has already been arranged  
☐ upgrading for additional electrical capacity is being sought.
- c. Computers: a sufficient quantity of computers ☐ has been purchased or ☐ is being sought.
- d. Computer maintenance: adequate arrangements ☐ have been made or ☐ are being sought.
- e. Staff development: ☐ all staff have had an appropriate level of training or ☐ additional training has already been scheduled or ☐ training is being sought.

17. Future requests: *(Providing this information is optional.)* If you have current plans to purchase additional services in the future, describe them below.

18. **Eligible Entities:** (Billed Entities.)

Billed Entity	Billed Entity Code (supplied by SLC)	Zip Code	Urban or Rural	Number of Students	Number of Students Eligible for National School Lunch Program

19. **Ineligible Entities:**

Name of Entity	Zip Code	Contact Person	Phone number, E-mail address, or alternative

20. The applicant includes:

- a. ☐ schools under the statutory definitions of elementary and secondary schools found in the Elementary and Secondary Education Act of 1965, 20 U.S.C. Secs. 8801(14) and (25), that do not operate as for-profit business, and do not have endowments exceeding \$50 million and/or
- b. ☐ libraries or library consortia eligible for assistance from a State library administrative agency under the Library Services Technology Act of 1996 that do not operate as for-profit businesses and do not receive their funding through an elementary or secondary school, college or university.

21. ☐ All of the individual schools, libraries, and library consortia listed above in items 1 and 18 are covered by individual or higher-level technology plans for using the services requested in this application (if those services consist of other than voice services).

22. a. ☐ Technology plan(s) will be approved by a state or other authorized body; or

b. ☐ Technology plan(s) will be submitted to Schools and Libraries Corporation for approval.

23. I certify that the services the applicant purchases at discounts provided by 47 U.S.C. Sec. 254 will be used solely for educational purposes and will not be sold, resold, or transferred in consideration for money or any other thing of value.

24. I recognize that support under this program is conditional upon the school(s) or library(ies) I represent securing access to all of the resources, including computers, internal connections, training, software, maintenance, electrical connections and security, necessary to use effectively the services purchased.
25. I certify that I am authorized to submit this request on behalf of the above-named applicant, that I have examined this request and to the best of my knowledge, information, and belief, all statements of fact contained herein are true.

26. Signature	27. Date
28. Printed name of authorized person	
29. Title or position of authorized person	

**Persons willfully making false statements on this form can be punished by forfeiture, under the Communications Act, 47 U.S.C. Secs. 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C., Sec. 1001.**

**NOTICE TO INDIVIDUALS:** Section 54.504 of the Federal Communication Commission's rules requires schools and libraries ordering services that are eligible for and seeking universal service discounts to file this Description of Services Requested and Certification Form (FCC Form 470) with the Universal Service Administrator, themselves or as part of a consortium. 47 U.S.C. § 54.504. The collection of information stems from the Commission's authority under Section 254 of the Communications Act of 1934, 47 U.S.C. § 254. The data in the report will be used to ensure that schools and libraries comply with the competitive bidding requirement contained in 47 U.S.C. § 54.504. All schools and libraries planning to order services eligible for universal service discounts must file this form themselves or as part of a consortium.

An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid control number.

The foregoing Notice is required by the Privacy Act of 1974, Pub. L. No. 93-579, December 31, 1974, 5 U.S.C. § 552, and the Paperwork Reduction Act of 1995, Pub. L. No. 104-13, 44 U.S.C. § 3506, et seq.

Public reporting burden for this collection of information is estimated to average 3 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, completing, and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing the reporting burden to the Federal Communications Commission, Records Management Branch, Washington, D.C. 20554..

This form should be submitted to:  
Administrator  
Schools and Libraries Corporation  
100 South Jefferson Rd  
Whippany, NJ 07981  
[add toll free phone number]

10/9/97 --

# Schools and Libraries Universal Service Program

## Services Ordered, Certification, and Termination

Please read instructions before completing. (To be completed by Billing Entity.) Estimated Average Burden Hours Per Response: 3 hours

1. Name of Applicant:

2a. Federal Employer Identification Number (EIN): (Individual schools or libraries should supply this information if they have an EIN.)

2b. School Code: (if individual school) (SLC will insert this code.)

2c. Applicant ID Number (assigned by SLC)

2d. Application Control Number (assigned by SLC)

3. Type of Applicant (Check only one in the first column on the left, but if a consortium, also check all that apply from other columns):

- ☐ school  
☐ school district  
☐ library or library consortium under the LSTA  
☐ consortia of multiple eligible entities

If consortium of schools, libraries, or other entities, check all that apply

- ☐ includes non-governmental entities for support  
☐ entity desires separate bills for each member of consortium  
☐ regional ☐ statewide ☐ multi-state  
☐ state education agency  
☐ local education agency  
☐ education service agency

4. Street Address

City

State

Zip Code

Telephone number

E-mail Address

5. Contact Person's Name:

Street Address (if different from Item 4)

City

State

Zip Code

Check preferred method of contact: ☐ Phone

☐ FAX

☐ E-mail

☐ Other:

6. Purpose of Request: (Check all that apply.)

- ☐ Discount on contract signed on or after date of contract(s): \_\_\_\_\_  
☐ Terminate existing service  
☐ Separate funding request under a master contract for which a request was previously filed  
Date(s) of master contract(s) \_\_\_\_\_  
Was Form 470 filed with regard to the master contract? Yes \_\_\_\_\_ No \_\_\_\_\_  
☐ Modification or supplement to existing contract(s) for which a Form 471 was already filed.

7. Services ordered by more than one entity (e.g., file server used by entire school district) (not location specific)

Billing Entity Code	Percent Discount to which Billing Entity is Entitled	Number of Students or Patrons	Name of Service Provider	CONTRACT			Services or Products	Service Start Date	Amount		
				Number	Award Date	Expiration Date			One Time	Monthly	Total
							Telecommunication Services				
							Internet				
							Internal connections				
							Telecommunication Services				
							Internet				
							Internal connections				
							Telecommunication Services				
							Internet				
							Internal connections				
							Telecommunication Services				
							Internet				
							Internal connections				

8. Services ordered by individual school or library (location specific)

School Code or Library EIN	Percent Discount to which Entity is Entitled	Number of Students or Patrons	Name of Service Provider	CONTRACT			Services or Products	Service Start Date	Amount		
				Number	Award Date	Expiration Date			One Time	Monthly	Total
							Telecommunication Services				
							Internet				
							Internal connections				
							Telecommunication Services				
							Internet				
							Internal connections				
							Telecommunication Services				
							Internet				
							Internal connections				
							Telecommunication Services				
							Internet				
							Internal connections				

9. a. Provide the total estimated support requested for the entire funding year.

b. Estimate the amount of support requested for the first six months of the year.

10. Provide the total estimated cost (pre-discount price) for the services you expect to order in the funding year following the one you are applying for funding here.

11. The applicant is eligible for support because it includes:

a. ☐ schools under the statutory definitions of elementary and secondary schools found in the Elementary and Secondary Education Act of 1965, 20 U.S.C. Secs. 8801(14) and (25), that do not operate as for-profit businesses and do not have endowments exceeding \$50 million; and/or

b. ☐ libraries or library consortia eligible for assistance from a state library administration under the Library Services Technology Act of 1996 that do not operate as for-profit businesses and do not receive their funding through an elementary or secondary school, college or university.

12. I certify that the entities eligible for support that I am representing have budgeted sufficient funds for their current fiscal years and intend to budget sufficient funds for the next fiscal year to ensure access to all the resources.

13. I certify that the entities eligible for support that I am representing are covered by a technology plan that will be approved by ☐ the appropriate state entity ☐ other \_\_\_\_\_ before filing this form to begin receiving support.

14. I certify that the entities eligible for support that I am representing have complied with all applicable state and local laws regarding procurements of services for which support is being sought.

15. I certify that I am authorized to submit this request on behalf of the applicable institution, that I have examined this request and to the best of my knowledge, information, and belief, all statements of fact contained herein are true.

16. Signature

17. Date

18. Printed name of authorized person

19. Title or position of authorized person

**Persons willfully making false statements on this form can be punished by fine or forfeiture, under the Communications Act, 47 U.S.C. Secs. 502, 503, or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. Sec. 1001.**

NOTICE TO INDIVIDUALS: Section 254 of the Federal Communication Commission's rules requires all schools and libraries ordering services that are eligible for and seeking universal service discounts to file this Description of Services Requested and Certification Form (FCC Form 470) with the Universal Service Administrator 47 C.F.R. § 54.504. The collection of information stems from the Commission's authority under Section 254 of the Communications Act of 1934, as amended, 47 U.S.C. § 254. The data in the report will be used to ensure that schools and libraries comply with the competitive bidding requirement contained in 47 C.F.R. § 54.504. All schools and libraries planning to order services eligible for universal service discounts must file this form themselves or as part of a consortium.

An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid control number.

The foregoing is exempted by the Privacy Act of 1974, Pub. L. No. 93-579, December 31, 1974, 5 U.S.C. § 552, and the Paperwork Reduction Act of 1995, Pub. L. No. 104-13, 44 U.S.C. § 3501, et seq.

Public reporting burden for this collection of information is estimated to average 3 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, completing, and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing the reporting burden to the Federal Communications Commission, Records Management Branch, Washington, D.C. 20554..

This form should be submitted to:  
Administrator  
Schools and Libraries Corporation  
100 South Jefferson Rd  
Whippany, NJ 07981  
[add toll free phone number]



## Appendix B: Email from Library Supporters

ALA requested that library supporters send email comments to the FCC on the proposed application forms. Attached are several dozen representative comments from libraries all across the country, representing rural, urban, and suburban systems. All of the comments expand on problems raised by the October 10 meeting.

**From:** Cathi Alloway <calloway@redrose.net>  
**To:** ALA\_DC\_DMN.ALA\_DC\_PO(ASJ),ALA\_DC\_DMN.INET("iflanne...  
**Date:** 10/14/97 8:43am  
**Subject:** Universal Service forms.

The proposed Universal Service forms are TOO CUMBERSOME for multi-agency libraries to complete. You must realize that libraries are non-profits and as such, most have minimal staffing, making it difficult to manage all the government paperwork that comes our way. Forms 470 and 471 would represent an undue burden on a library such as ours which will probably apply as part of a large consortium. I understand that documentation and application is part of being responsible with government dollars, but I am also increasingly appalled at the amount of seemingly unnecessary paperwork needed to proceed with grants and other funding.

Isn't the point of the program to provide assistance??? Where is the benefit of this program if we must sacrifice precious staff time with our customers to get this paperwork done??? I won't need the Internet in my library - no one will want to come in!

Please reconsider and STREAMLINE the reporting and documentation paperwork. Don't make this program any more complex than it needs to be.

These are my personal opinions as Director of the Library and do not reflect an official position of my employers.

**From:** Ruth Arnold <rarnold@leo.vsla.edu>  
**To:** ALA\_DC\_DMN.INET("mnadel@fcc.gov")  
**Date:** 10/14/97 9:57am  
**Subject:** Universal Service Discount Applications

Dear Mr. Nadel:

I have learned from the Library of Virginia and the American Library Association that the FCC is seriously considering some very complicated application procedures for libraries and schools who wish to apply for Universal Service discounts. I understand that the new procedures will make it very difficult for consortia to apply for discounts. We strongly oppose this measure.

Our library is part of the Shenandoah Public Education Network, a consortium of public school systems and libraries in 3 municipalities. With the assistance of a local telephone company, we are in the process of bringing internet access to 32 schools and 3 public libraries. Our library has been providing free internet access to our patrons since December, 1996.

We believe that the Universal Service discounts will help us improve our service and allocate our funding more equitably. Our service areas cover a large rural county and two small cities (under 25,000) with sizeable school lunch populations. A complicated application procedure that discriminates against consortia could act as a deterrent to our applying and in effect deny us the right to take advantage of this opportunity.

We urge you to reconsider these application procedures.  
Thank you.

--

Ruth Arnold, Director  
Staunton Public Library  
1 Churchville Avenue  
Staunton, VA 24401

rarnold@leo.vsla.edu  
(540) 332-3902  
(540) 332-3906 FAX

**CC:** ALA\_DC\_DMN.ALA\_DC\_PO(ASJ), ALA\_DC\_DMN.INET("iflanne...)

**From:** Karen Aughinbaugh <kaughin@sjvls.lib.ca.us>  
**To:** ALA\_DC\_DMN.ALA\_DC\_PO(ASJ),ALA\_DC\_DMN.INET("iflanne...  
**Date:** 10/13/97 6:01pm  
**Subject:** form 470/471 changes

Dear Mr.Nadel,

It has been brought to my attention that at a Friday, Oct. 10,1997 meeting regarding application forms for Universal Service, changes were made which will have serious negative effects on schools and libraries. Specifically, changes were made to Forms 470 and 471 which could prevent normal aggregation and the resultant cost savings which result.

If collective ordering and simplified records are discouraged or prevented by the changes made during that meeting, the most needy and deserving of schools and libraries may be procluded from applying for support. Not from lack of need, bur because of the complexity and cost of separate applications for items ordered for an entire system.

I urge you and Irene Flannery to work quickly to lessen the complexities and restore the ability to aggregate orders and send in fewer applications and retain the cost-savings so necessary to libraries and schools. Otherwise, the intent of allowing application for universal support for schools and libraries in poorer and more remote areas will have the opposite effect.

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Name: Karen Aughinbaugh  
E-mail: Karen Aughinbaugh <kaughin@sjvls.lib.ca.us>  
Date: 10/13/97  
Time: 3:01:53 PM

This message was sent by Chameleon  
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**From:** Janis Augustine <jaugusti@leo.vsla.edu>  
**To:** ALA\_DC\_DMN.INET("iflanner@fcc.gov")  
**Date:** 10/13/97 4:09pm  
**Subject:** e-rate application

I hope that you all at the FCC will make sure that the e-rate application remains simple so that libraries may apply as entire systems or consortia. If each site in a system is required to apply for its own discount, libraries may not apply at all. The purpose of the discounts was to encourage libraries to get on the Information Highway; making the application process so complex defeats this purpose.

Thank you for your attention.

Janis Augustine  
Library Director  
Salem Public Library  
Salem, VA 24153

**CC:** ALA\_DC\_DMN.ALA\_DC\_PO(ASJ)

**From:** Skip Auld CCPL <hauld@ccpl.carr.lib.md.us>  
**To:** ALA\_DC\_DMN.INET("iflanner@fcc.gov","mnadel@fcc.gov...  
**Date:** 10/13/97 9:42pm  
**Subject:** Universal Service Aggregation

Dear Mr. Nadel and Ms. Flannery:

Our library system is planning to submit an application for discounted telecommunications services. We have been working for over two years to plan for technology, including Internet access and our first integrated online library system.

The discounts approved by the FCC, based on the Telecommunications Act of 1996, will be very helpful. However, I strongly urge you to keep the process as simple as possible. Any complication of the aggregation process will undermine the intent and outcome of the entire program. Please, keep it simple. Thank you.

Hampton M. "Skip" Auld  
Assistant Director  
Chesterfield County Public Library  
9501 Lori Road; P.O. Box 297  
Chesterfield, Virginia 23832-0297  
(804) 748-1767  
Fax: (804) 751-4679  
Email: hauld@ccpl.carr.lib.md.us

**CC:** ALA\_DC\_DMN.ALA\_DC\_PO(ASJ)

**From:** Dallas Baillio <dbaillio@acan.net>  
**To:** ALA\_DC\_DMN.INET("iflanner@fcc.gov")  
**Date:** 10/13/97 9:48am  
**Subject:** Aggregation Elimination

Aggregation Elimination means application aggravation. Looking at school lunch figures for our community, I estimate we will be eligible for 80 percent discounts, if we apply. When I read of the latest complication, my first reaction was, well there goes another nail in the coffin. If it gets overly complicated we'll just wait a couple of years for the dust to settle. Then I thought, no that is exactly what the telcos would like to see happen. If few applications are received they will turn it to some PR advantage aimed toward eliminating the process.

I urge the FCC to keep the process as simple as possible. There are a lot of small libraries in our state that have only one or two staff members. They have small budgets and few resources. Adopting technology is already a daunting task for them fraught not only with a steep learning curve, but also with fear and technostress. If the process is overly complicated, these very needy and worthy libraries will fall by the wayside. Don't make this big mistake. The FCC must make the process very simple and straightforward, otherwise you'll hurt those you intend to help. You'll fall right into the law of unintended consequences.

Dallas Baillio  
Director  
Mobile (AL) Public Library  
334-208-7100

**CC:** ALA\_DC\_DMN.ALA\_DC\_PO(ASJ)

**From:** Chip Barnett <cbarnett@lib.rang.gen.va.us>  
**To:** ALA\_DC\_DMN.INET("mnadel@fcc.gov")  
**Date:** 10/11/97 10:46am  
**Subject:** Universal Service application rules

Dear Mr. Nadel,

I understand through the American Library Association that the FCC yesterday complicated the rules for schools and libraries to apply for Universal Service discounts, with services and discounts having to be broken down to the level of individual sites. We strongly oppose such a change.

The Rockbridge Regional Library (five library sites) formed a consortium last year with the four public school systems in this rural region of western Virginia to implement a frame relay network that provides Internet service for all 22 schools and public libraries here, including the provision of free service for the general public at the RRL. We were able to complete such an ambitious project on a shoestring only with the help of the Dept. of Commerce's Telecommunications and Information Infrastructure Assistance Program and by banding together to pool our expertise and financial resources. Our Internet access has been running successfully for exactly a year, a tremendous asset to the community.

However, because of the rural nature of that community, some of our sites are served by as many as four different phone companies and are being overwhelmed by the leased-line charges that can be as much as quadruple the cost for a site served by a single provider. We have corresponded with the FCC about this problem, without result.

While we still need to resolve that separate issue, in the meantime we have been counting heavily on the Universal Service discounts to help us financially. Because of our consortium structure, it would be an back-breaking burden to have to apply in the detail I understand you are now requiring.

Please reconsider the change. Thanks for your help.

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Chip Barnett (cbarnett@lib.rang.gen.va.us)	Rockbridge Regional Library
540-463-4324	138 S. Main Street
540-464-4824 (fax)	Lexington, VA 24450
Home page address: <a href="http://www.lib.rang.gen.va.us/">http://www.lib.rang.gen.va.us/</a>	

**CC:** ALA\_DC\_DMN.ALA\_DC\_PO(ASJ), ALA\_DC\_DMN.INET("gmccrow...")



**From:** Ellen Bell <ebell@leo.vsla.edu>  
**To:** ALA\_DC\_DMN.INET("mnadel@fcc.gov")  
**Date:** 10/13/97 4:23pm  
**Subject:** Please don't do that!

According to the information I have seen, serious consideration is being given to altering forms 470 and 471 to force applicants to apply individual library buildings' (and schools') discounts to the vast majority of services and to force libraries (and schools) to provide extensive information on the contract for each branch, even if the contract serves multiple branches.

The more paperwork you force us to fill out, the fewer libraries and schools that will apply. To be honest, if our library system (consisting of 5 different locations) didn't stand to gain something like \$13,000 a year in discounts (that we can then turn around and use to buy technology), I wouldn't even be jumping through the technical plan hoops. If You make the process costly, in terms of time required to file, smaller libraries will not be able to afford to apply because they are already stretched so thin.

I guess I'm being cynical, but when I first heard about the discounts, I figured, "Well, it's federal money, so it won't be easy to get." If we have to do calculations unit by unit and fill out 5 or 6 pieces of paper where one would do, I will have been proven right. Please don't do it! Please try to make this process as simple as is humanly possible; most of us don't have extra folks available for pushing extra paper around!

Thanks for listening.

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O:-D

Ellen Bell, Blue Ridge Regional Library  
P.O. Box 5264, Martinsville, VA 24115  
Phone: 540/632-7125 x 224  
FAX: 540/632-1660

**CC:** ALA\_DC\_DMN.ALA\_DC\_PO(ASJ),ALA\_DC\_DMN.INET("iflanne...